

Ohio Democratic Party v. Ohio Republican Party, et al.**EXHIBITS TO DECLARATION OF DAWN L. SMALLS, ESQ.****INDEX**

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Exhibit 1

Trump loyalists plan own exit poll amid claims of 'rigged' election

Effort led by Trump confidante and conspiracy theorist Roger Stone targets cities with large minority populations, a tactic experts say could intimidate voters

Oliver Laughland and Sam Thielman in New York

Thursday 20 October 2016 17.40 EDT

Donald Trump loyalists will attempt to conduct their own crowd-funded exit polling on election day, ostensibly due to fears that electronic voting machines in certain areas may have been “rigged”, the Guardian has learned.

But the effort, led by Trump’s notorious informal adviser Roger Stone, will focus on 600 different precincts in nine Democrat-leaning cities with large minority populations, a tactic branded highly irregular by experts, who suggested that organizers could potentially use the polling as a way to intimidate voters.

Stone told the Guardian that around 1,300 volunteers from the controversial Citizens for Trump grassroots coalition would conduct exit polling in Cleveland, Detroit, Philadelphia, Las Vegas, Milwaukee, Fort Lauderdale, Charlotte, Richmond and Fayetteville - all locations in pivotal swing states.

Media organizations and political campaigns conduct exit polling for all major elections, but David Paleologos - a polling expert and director of the Suffolk University Political Research Center - said effective exit polling was done in bellwether precincts, not in areas likely to be dominated by a particular political party.

“It doesn’t sound like that’s a traditional exit poll,” Paleologos said of Stone’s planned efforts. “It sounds like that’s just gathering data, in heavily Democratic areas for some purpose. It doesn’t sound like exit polling.”

The Republican nominee said during Wednesday’s debate he would keep America “in suspense” over whether he would accept the outcome of the vote on 8 November, and on Thursday he said he would accept only “if I win” or if it is a “clear” result. He has frequently told his supporters that the election is being “rigged” against him, and since August his campaign has been recruiting election observers in anticipation of what he claims could be widespread voter fraud.

On Thursday, Stone, a noted conspiracy theorist, argued that the campaign had focused their efforts to combat the so-called “rigged election” in the wrong area and should instead concentrate on “election theft” via hacked or compromised voting machines.

“To those who say that it would be un-American to challenge the election on the basis that it was rigged, I would argue it would be un-American to have evidence of that rigging and not challenge

the election,” Stone said.

Experts have taken several steps to remedy the digital vulnerabilities in voting machines in recent years. Last year at least one voting machine system was found to be substantially insecure. Princeton researcher Jeremy Epstein, now of technology firm SRI, discovered that WinVote machines used in Virginia could be accessed comparatively easily over a Wi-Fi connection through simple passwords. Epstein successfully pushed to have the machines decertified.

Epstein told the Guardian that exit polls in particular were a dangerously inaccurate way to gauge the legitimacy of an election. “There’s a lot of evidence that exit polls are not very accurate,” Epstein said. “People don’t tell the pollsters what they actually did. In this election, depending on the neighborhood, people might not want to admit that they voted for Clinton or that they voted for Trump.”

There are already methods in place to determine the accuracy of the results in a contested district. “Roughly 75, 80% of all voters in this election will use paper ballots,” Epstein said, “so even if the machines were hacked, we’d have the paper ballots to go back to in most cases, especially in states where they do audits.”

The Department of Homeland Security is already taking precautions to make sure election results are not interfered with electronically. “To date, 33 state and 11 county or local election agencies have approached the Department of Homeland Security about our cybersecurity services,” the department said in a press release issued 10 October. DHS continues to offer “cyber-hygiene” services to other state or local boards looking for protection against hacking.

Rick Hasen, an election law expert at the University of California, shared Epstein’s concerns over using exit polls as way of measuring the legitimacy of an election and warned: “It doesn’t sound like a scientific way to do things, nor do I think it’s a sound way to ferret out machine problems, it sounds much more like a Roger Stone dirty trick.”

Stone, who did not identify the particular precincts volunteers would be targeting, argued that the polling methodology, was “designed by professionals”, but was unable to identify who these professionals were. The former Richard Nixon adviser added that the effort was being run by the “Stop the Steal” organization, a group founded by Stone in the lead up to the Republican national convention in July, which organized protests aimed at preventing party delegates from taking the nomination away from Trump.

The Citizens for Trump coalition, which will supply volunteers for the polling, was also present at the Republican convention and organized a large rally in Cleveland alongside a host of fringe organizations, including armed vigilantes group Bikers for Trump and the conspiracy theorist website Infowars.

“It sounds like he’s organizing a goon squad that could potentially be intimidating voters in minority areas,” said Hasen. “It does raise the threat of violence on election day at polling places. People are going to have to be vigilant.”

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Exhibit 2

Form
(Rev. July 2003)Department of the Treasury
Internal Revenue Service**8871****Political Organization
Notice of Section 527 Status**

OMB No. 1545-1693

Part I General Information**1 Name of organization**

Stop The Steal

Employer identification number

81 - 2115618

2 Mailing address (P.O. box or number, street, and room or suite number)

3843 S Bristol Street Suite 312

City or town, state, and ZIP code

Santa Ana, CA 92704 -

3 Check applicable box:

Initial notice



Amended notice



Final notice

4a Date established

04/06/2016

4b Date of material change

04/06/2016

5 E-mail address of organization

no@email

6a Name of custodian of records

Sarah Rollins

6b Custodian's address

3843 S Bristol Street Suite 312

Santa Ana, CA 92704 -

7a Name of contact person

Sarah Rollins

7b Contact person's address

3843 S Bristol Street Suite 312

Santa Ana, CA 92704 -

8 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number

3843 S Bristol Street Suite 312

City or town, state, and ZIP code

Santa Ana, CA 92704 -

9a Election authority

NONE

9b Election authority identification number**Part II Notification of Claim of Exemption From Filing Certain Forms (see instructions)****10a** Is this organization claiming exemption from filing Form 8872, Political Organization Report of Contributions and Expenditures, as a qualified state or local political organization? Yes ☐ No ☒**10b** If 'Yes,' list the state where the organization files reports:**11** Is this organization claiming exemption from filing Form 990 (or 990-EZ), Return of Organization Exempt from Income Tax, as a caucus or associations of state or local officials? Yes ☐ No ☒

Part III Purpose

12 Describe the purpose of the organization

To help preserve the integrity and honesty of the delegate selection process to the 2016 Republican National Convention

Part IV List of All Related Entities (see instructions)

13 Check if the organization has no related entities

..... ✓

14a Name of related entity

14b Relationship

14c Address

Part V List of All Officers, Directors, and Highly Compensated Employees (see instructions)

15a Name

15b Title

15c Address

Sarah Rollins

Treasurer

3843 S Bristol Street Suite 312

Santa Ana, CA 92704 -

Under penalties of perjury, I declare that the organization named in Part I is to be treated as a tax-exempt organization described in section 527 of the Internal Revenue Code, and that I have examined this notice, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. I further declare that I am the official authorized to sign this report, and I am signing by entering my name below.

Sarah Rollins

04/06/2016

**Sign
Here**

Name of authorized official



Date

Exhibit 3

Form
(Rev. July 2003)Department of the Treasury
Internal Revenue Service**8871****Political Organization
Notice of Section 527 Status**

OMB No. 1545-1693

Part I General Information**1 Name of organization**

Stop The Steal

Employer identification number

81 - 2115618

2 Mailing address (P.O. box or number, street, and room or suite number)

3843 S Bristol Street Suite 312

City or town, state, and ZIP code

Santa Ana, CA 92704 -

3 Check applicable box:☐ Initial notice ☒ Amended notice ☐ Final notice**4a Date established**

04/06/2016

4b Date of material change

06/03/2016

5 E-mail address of organization

no@email

6a Name of custodian of records

Brad Boeck

6b Custodian's address

3843 S Bristol Street Suite 312

Santa Ana, CA 92704 -

7a Name of contact person

Brad Boeck

7b Contact person's address

3843 S Bristol Street Suite 312

Santa Ana, CA 92704 -

8 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number

3843 S Bristol Street Suite 312

City or town, state, and ZIP code

Santa Ana, CA 92704 -

9a Election authority

NONE

9b Election authority identification number**Part II Notification of Claim of Exemption From Filing Certain Forms (see instructions)****10a Is this organization claiming exemption from filing Form 8872, Political Organization Report of Contributions and Expenditures, as a qualified state or local political organization?** Yes ☐ No ☒**10b If 'Yes,' list the state where the organization files reports:****11 Is this organization claiming exemption from filing Form 990 (or 990-EZ), Return of Organization Exempt from Income Tax, as a caucus or associations of state or local officials?** Yes ☐ No ☒

Part III Purpose

12 Describe the purpose of the organization

To help preserve the integrity and honesty of the delegate selection process to the 2016 Republican National Convention.

Part IV List of All Related Entities (see instructions)

13 Check if the organization has no related entities

..... ✓

14a Name of related entity	14b Relationship	14c Address
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Part V List of All Officers, Directors, and Highly Compensated Employees (see instructions)

15a Name	15b Title	15c Address
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Brad Boeck	Treasurer	3843 S Bristol Street Suite 312 Santa Ana, CA 92704 -
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Under penalties of perjury, I declare that the organization named in Part I is to be treated as a tax-exempt organization described in section 527 of the Internal Revenue Code, and that I have examined this notice, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. I further declare that I am the official authorized to sign this report, and I am signing by entering my name below.

Brad Boeck

06/03/2016

**Sign
Here**

Name of authorized official



Date

Exhibit 4

Form **8872**
(Rev. October 2014)
Department of the Treasury
Internal Revenue Service

Political Organization
Report of Contributions and Expenditures

OMB No 1545-0123

**Open to Public
Inspection**

► Information about Form 8872 and its instructions is available at www.irs.gov/form8872.
► Do not enter social security numbers on this form or any attachments to it as they may be made public.

A For the period beginning <u>April 8</u> , 20 <u>16</u> and ending <u>June 30</u> , 20 <u>16</u>											
B Check applicable boxes: <input checked="" type="checkbox"/> Initial report <input type="checkbox"/> Change of address <input type="checkbox"/> Amended report <input type="checkbox"/> Final report											
1 Name of organization <u>Stop the Steal</u>	Employer identification number <u>81-2115618</u>										
2 Mailing address (P.O. Box or number, street, and room or suite number) <u>3843 S. Bristol Street Suite 312</u>											
City or town, state or province, country, and ZIP or foreign postal code <u>Santa Ana, CA 92704</u>											
3 Email address of organization	4 Date organization was formed <u>4/8/2016</u>										
5a Name of custodian of records <u>Brad Boeck</u>	5b Custodian's address <u>3843 S. Bristol Street Suite 312</u> <u>Santa Ana, CA 92704</u>										
6a Name of contact person <u>Brad Boeck</u>	6b Contact person's address <u>3843 S. Bristol Street Suite 312</u> <u>Santa Ana, CA 92704</u>										
7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number											
City or town, state or province, country, and ZIP or foreign postal code											
8 Type of report (check only one box)											
<table border="0"> <tr> <td>a <input type="checkbox"/> First quarterly report (due by April 15)</td> <td>f <input type="checkbox"/> Monthly report for the month of: _____ (due by the 20th day following the month shown above, except the December report, which is due by January 31)</td> </tr> <tr> <td>b <input checked="" type="checkbox"/> Second quarterly report (due by July 15)</td> <td>g <input type="checkbox"/> Pre-election report (due by the 12th or 15th day before the election) (1) Type of election: _____ (2) Date of election: _____ (3) For the state of: _____</td> </tr> <tr> <td>c <input type="checkbox"/> Third quarterly report (due by October 15)</td> <td>h <input type="checkbox"/> Post-general election report (due by the 30th day after general election) (1) Date of election: _____ (2) For the state of: _____</td> </tr> <tr> <td>d <input type="checkbox"/> Year-end report (due by January 31)</td> <td></td> </tr> <tr> <td>e <input type="checkbox"/> Mid-year report (Non-election year only; due by July 31)</td> <td></td> </tr> </table>		a <input type="checkbox"/> First quarterly report (due by April 15)	f <input type="checkbox"/> Monthly report for the month of: _____ (due by the 20th day following the month shown above, except the December report, which is due by January 31)	b <input checked="" type="checkbox"/> Second quarterly report (due by July 15)	g <input type="checkbox"/> Pre-election report (due by the 12th or 15th day before the election) (1) Type of election: _____ (2) Date of election: _____ (3) For the state of: _____	c <input type="checkbox"/> Third quarterly report (due by October 15)	h <input type="checkbox"/> Post-general election report (due by the 30th day after general election) (1) Date of election: _____ (2) For the state of: _____	d <input type="checkbox"/> Year-end report (due by January 31)		e <input type="checkbox"/> Mid-year report (Non-election year only; due by July 31)	
a <input type="checkbox"/> First quarterly report (due by April 15)	f <input type="checkbox"/> Monthly report for the month of: _____ (due by the 20th day following the month shown above, except the December report, which is due by January 31)										
b <input checked="" type="checkbox"/> Second quarterly report (due by July 15)	g <input type="checkbox"/> Pre-election report (due by the 12th or 15th day before the election) (1) Type of election: _____ (2) Date of election: _____ (3) For the state of: _____										
c <input type="checkbox"/> Third quarterly report (due by October 15)	h <input type="checkbox"/> Post-general election report (due by the 30th day after general election) (1) Date of election: _____ (2) For the state of: _____										
d <input type="checkbox"/> Year-end report (due by January 31)											
e <input type="checkbox"/> Mid-year report (Non-election year only; due by July 31)											
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 10px auto;"> <p style="text-align: center;">RECEIVED</p> <p style="text-align: center;">JUL 18 2016</p> <p style="text-align: center;">OGDEN, UT</p> <p style="text-align: right; font-size: small;">IRS-OSC</p> </div>											
9 Total amount of reported contributions (total from all attached Schedules A)	9 67,654.16										
10 Total amount of reported expenditures (total from all attached Schedules B)	10 4,436.05										

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Sign Here Brad Boeck Date 7/15/16

Signature of authorized official

For Paperwork Reduction Act Notice, see separate instructions.

Cat No. 30406G

Form **8872** (Rev. 10-2014)

SCANNED JUL 28 2016

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Form 8872 (Rev. 10-2014)

Schedule A Itemized Contributions (DO NOT enter social security numbers on this schedule.)			Schedule A page 1 of 3
Name of organization Stop the Steal		Employer identification number 81-2115618	
Contributor's name, mailing address and ZIP code Committee to Restore America's Greatness 3843 S. Bristol St Suite 312 Santa Ana, CA 92704	Name of contributor's employer NA	Amount of contribution	
	Contributor's occupation NA	\$ 50,000.00	
	Aggregate contributions year-to-date ▶ \$ 50,000.00	Date of contribution 4/6/2016	
Contributor's name, mailing address and ZIP code Michael Schroer P. O. Box 377 Fremont, OH 43420	Name of contributor's employer Self-employed	Amount of contribution	
	Contributor's occupation Engineer	\$ 2,000.00	
	Aggregate contributions year-to-date ▶ \$ 2,000.00	Date of contribution 4/12/16	
Contributor's name, mailing address and ZIP code Patricia Daniel 256 Rancho Alegre Road Santa Fe, NM 87508	Name of contributor's employer Self-employed	Amount of contribution	
	Contributor's occupation Investor	\$ 1,000.00	
	Aggregate contributions year-to-date ▶ \$ 1,000.00	Date of contribution 4/12/16	
Contributor's name, mailing address and ZIP code Wayne Scott 650 N Rock Road Ft. Pierce, FL 34945	Name of contributor's employer Scott Citrus Mgmt Inc.	Amount of contribution	
	Contributor's occupation Citrus Grower	\$ 200.00	
	Aggregate contributions year-to-date ▶ \$ 200.00	Date of contribution 4/12/16	
Contributor's name, mailing address and ZIP code Gene Valentine Financial West Group 1500 Brinker Road PO Box 31 Wellsburg, WV 26070	Name of contributor's employer Financial West Group	Amount of contribution	
	Contributor's occupation Securities Dealer	\$ 200.00	
	Aggregate contributions year-to-date ▶ \$ 200.00	Date of contribution 4/13/16	
Contributor's name, mailing address and ZIP code Ross Kamm 708 Pine Road Kemah, TX 77565	Name of contributor's employer Public Company	Amount of contribution	
	Contributor's occupation Vice President	\$ 200.00	
	Aggregate contributions year-to-date ▶ \$ 200.00	Date of contribution 4/13/16	
Contributor's name, mailing address and ZIP code Suzanne Hayes 8292 Middle Essex Cv Cordova, TN 38016	Name of contributor's employer Self-employed	Amount of contribution	
	Contributor's occupation Consultant	\$ 200.00	
	Aggregate contributions year-to-date ▶ \$ 200.00	Date of contribution 4/13/16	
Contributor's name, mailing address and ZIP code Kristen Mower 120 Via Coronado Rancho Santa Fe, CA 92091	Name of contributor's employer None	Amount of contribution	
	Contributor's occupation Retired	\$ 100.00	
	Aggregate contributions year-to-date ▶ \$ 100.00	Date of contribution 4/16/16	
Contributor's name, mailing address and ZIP code Kristen Mower 120 Via Coronado Rancho Santa Fe, CA 92091	Name of contributor's employer None	Amount of contribution	
	Contributor's occupation Retired	\$ 150.00	
	Aggregate contributions year-to-date ▶ \$ 250.00	Date of contribution 5/1/2016	
Subtotal of contributions reported on this page only. Enter here and also include this amount in the total on line 9 of Form 8872 ▶		\$ 54,050.00	
Open to Public Inspection		Form 8872 (Rev. 10-2014)	

Form 8872 (Rev. 10-2014)

Schedule B Itemized Expenditures (DO NOT enter social security numbers on this schedule.)		Schedule B page 2 of 3
Name of organization Stop the Steal		Employer identification number 81-2115618

Recipient's name, mailing address and ZIP code Sarah Rollins 3843 S. Bristol Street, Suite 312 Santa Ana, Ca 92704	Name of recipient's employer Stop the Steal	Amount of expenditure \$ 110.50
	Recipient's occupation Treasurer	Date of expenditure 4/13/16
Purpose of expenditure Consulting Fees		

Recipient's name, mailing address and ZIP code Sarah Rollins 3843 S. Bristol Street, Suite 312 Santa Ana, Ca 92704	Name of recipient's employer Stop the Steal	Amount of expenditure \$ 276.22
	Recipient's occupation Treasurer	Date of expenditure 4/13/16
Purpose of expenditure Expense Reimbursement		

Recipient's name, mailing address and ZIP code Sarah Rollins 3843 S. Bristol Street, Suite 312 Santa Ana, Ca 92704	Name of recipient's employer Stop the Steal	Amount of expenditure \$ 500.00
	Recipient's occupation Treasurer	Date of expenditure 4/15/16
Purpose of expenditure Consulting Fees		

Recipient's name, mailing address and ZIP code Sarah Rollins 3843 S. Bristol Street, Suite 312 Santa Ana, Ca 92704	Name of recipient's employer Stop the Steal	Amount of expenditure \$ 500.00
	Recipient's occupation Treasurer	Date of expenditure 5/15/16
Purpose of expenditure Consulting Fees		

Recipient's name, mailing address and ZIP code Paul Nagy P. O. Box 205 East Andover, NH 03231	Name of recipient's employer Information Requested	Amount of expenditure \$ 800.00
	Recipient's occupation Information Requested	Date of expenditure 6/8/16
Purpose of expenditure Expense reimbursements for rally		

Recipient's name, mailing address and ZIP code Jim Baker information requested	Name of recipient's employer Information Requested	Amount of expenditure \$ 1,500.00
	Recipient's occupation Information Requested	Date of expenditure 4/14/16
Purpose of expenditure Expense reimbursements for rally		

Subtotal of expenditures reported on this page only. Enter here and also include this amount in the total on line 10 of Form 8872		\$ 3,688.72
Open to Public Inspection		Form 8872 (Rev 10-2014)

Form 8872 (Rev. 10-2014)

Schedule A Itemized Contributions (DO NOT enter social security numbers on this schedule.)			Schedule A page 3 of 3
Name of organization Stop the Steal			Employer identification number 81-2115618
Contributor's name, mailing address and ZIP code Aggregate below Threshold	Name of contributor's employer N/A		Amount of contribution
	Contributor's occupation N/A		\$ 9,704.00
	Aggregate contributions year-to-date ▶	\$ 9,704.00	Date of contribution 6/30/2016
Contributor's name, mailing address and ZIP code	Name of contributor's employer		Amount of contribution
	Contributor's occupation		\$
	Aggregate contributions year-to-date ▶	\$	Date of contribution
Contributor's name, mailing address and ZIP code	Name of contributor's employer		Amount of contribution
	Contributor's occupation		\$
	Aggregate contributions year-to-date ▶	\$	Date of contribution
Contributor's name, mailing address and ZIP code	Name of contributor's employer		Amount of contribution
	Contributor's occupation		\$
	Aggregate contributions year-to-date ▶	\$	Date of contribution
Contributor's name, mailing address and ZIP code	Name of contributor's employer		Amount of contribution
	Contributor's occupation		\$
	Aggregate contributions year-to-date ▶	\$	Date of contribution
Contributor's name, mailing address and ZIP code	Name of contributor's employer		Amount of contribution
	Contributor's occupation		\$
	Aggregate contributions year-to-date ▶	\$	Date of contribution
Contributor's name, mailing address and ZIP code	Name of contributor's employer		Amount of contribution
	Contributor's occupation		\$
	Aggregate contributions year-to-date ▶	\$	Date of contribution
Contributor's name, mailing address and ZIP code	Name of contributor's employer		Amount of contribution
	Contributor's occupation		\$
	Aggregate contributions year-to-date ▶	\$	Date of contribution
Contributor's name, mailing address and ZIP code	Name of contributor's employer		Amount of contribution
	Contributor's occupation		\$
	Aggregate contributions year-to-date ▶	\$	Date of contribution
Contributor's name, mailing address and ZIP code	Name of contributor's employer		Amount of contribution
	Contributor's occupation		\$
	Aggregate contributions year-to-date ▶	\$	Date of contribution
Subtotal of contributions reported on this page only. Enter here and also include this amount in the total on line 9 of Form 8872 ▶			\$ 9,704.00
Open to Public Inspection			Form 8872 (Rev. 10-2014)

Form 8872 (Rev. 10-2014)

Schedule B Itemized Expenditures (DO NOT enter social security numbers on this schedule.)		Schedule B page 2 of 3
Name of organization Stop the Steal		Employer identification number 81-2115618

Recipient's name, mailing address and ZIP code Sarah Rollins 3843 S. Bristol Street, Suite 312 Santa Ana, Ca 92704	Name of recipient's employer Stop the Steal	Amount of expenditure \$ 110.50
	Recipient's occupation Treasurer	Date of expenditure 4/13/16
Purpose of expenditure Consulting Fees		

Recipient's name, mailing address and ZIP code Sarah Rollins 3843 S. Bristol Street, Suite 312 Santa Ana, Ca 92704	Name of recipient's employer Stop the Steal	Amount of expenditure \$ 276.22
	Recipient's occupation Treasurer	Date of expenditure 4/13/16
Purpose of expenditure Expense Reimbursement		

Recipient's name, mailing address and ZIP code Sarah Rollins 3843 S. Bristol Street, Suite 312 Santa Ana, Ca 92704	Name of recipient's employer Stop the Steal	Amount of expenditure \$ 500.00
	Recipient's occupation Treasurer	Date of expenditure 4/15/16
Purpose of expenditure Consulting Fees		

Recipient's name, mailing address and ZIP code Sarah Rollins 3843 S. Bristol Street, Suite 312 Santa Ana, Ca 92704	Name of recipient's employer Stop the Steal	Amount of expenditure \$ 500.00
	Recipient's occupation Treasurer	Date of expenditure 5/15/16
Purpose of expenditure Consulting Fees		

Recipient's name, mailing address and ZIP code Paul Nagy P. O. Box 205 East Andover, NH 03231	Name of recipient's employer Information Requested	Amount of expenditure \$ 800.00
	Recipient's occupation Information Requested	Date of expenditure 6/8/16
Purpose of expenditure Expense reimbursements for rally		

Recipient's name, mailing address and ZIP code Jim Baker information requested	Name of recipient's employer Information Requested	Amount of expenditure \$ 1,500.00
	Recipient's occupation Information Requested	Date of expenditure 4/14/16
Purpose of expenditure Expense reimbursements for rally		

Subtotal of expenditures reported on this page only. Enter here and also include this amount in the total on line 10 of Form 8872		\$ 3,688.72
Open to Public Inspection		Form 8872 (Rev. 10-2014)

Form 8872 (Rev. 10-2014)

Schedule B Itemized Expenditures (DO NOT enter social security numbers on this schedule.)		Schedule B page 2 of 2
Name of organization Stop the Steal		Employer identification number 81-2115618

Recipient's name, mailing address and ZIP code Democracy Engine 2125 Fourteenth Street NW Washington, DC 20009	Name of recipient's employer NA	Amount of expenditure \$ 659.45
	Recipient's occupation NA	Date of expenditure 5/29/16

Purpose of expenditure

Contributions processing

Recipient's name, mailing address and ZIP code Democracy Engine 2125 Fourteenth Street NW Washington, DC 20009	Name of recipient's employer NA	Amount of expenditure \$ 49.88
	Recipient's occupation NA	Date of expenditure 6/30/16

Purpose of expenditure

Contributions Processing

Recipient's name, mailing address and ZIP code Aggregate below Threshold	Name of recipient's employer NA	Amount of expenditure \$ 40.00
	Recipient's occupation NA	Date of expenditure

Purpose of expenditure

Recipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of expenditure \$
	Recipient's occupation	Date of expenditure

Purpose of expenditure

Recipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of expenditure \$
	Recipient's occupation	Date of expenditure

Purpose of expenditure

Recipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of expenditure \$
	Recipient's occupation	Date of expenditure

Purpose of expenditure

Subtotal of expenditures reported on this page only. Enter here and also include this amount in the total on line 10 of Form 8872	\$ 749.33
Open to Public Inspection	

Form **8872** (Rev. 10-2014)

Exhibit 5

Form **8872**
(November 2002)
Department of the Treasury
Internal Revenue Service

Political Organization Report of Contributions and Expenditures

OMB No. 1545-1696

▶ See separate instructions.

A For the period beginning 07/01/2016 **and ending** 09/30/2016

B Check applicable box: ☒ Initial report ☐ Change of address ☐ Amended report ☐ Final report

1 Name of organization Stop The Steal **Employer identification number** 81 - 2115618

2 Mailing address (P.O. box or number, street, and room or suite number)
3843 S Bristol Street Suite 312

City or town, state, and ZIP code
Santa Ana, CA 92704

3 E-mail address of organization: no@email **4 Date organization was formed:** 04/06/2016

5a Name of custodian of records Brad Boeck
5b Custodian's address 3843 S Bristol Street Suite 312
Santa Ana, CA 92704

6a Name of contact person Brad Boeck
6b Contact person's address 3843 S Bristol Street Suite 312
Santa Ana, CA 92704

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
3843 S Bristol Street Suite 312

City or town, state, and ZIP code
Santa Ana, CA 92704

8 Type of report (check only one box)

- ☐ First quarterly report (due by April 15)
☐ Second quarterly report (due by July 15)
☒ Third quarterly report (due by October 15)
☐ Year-end report (due by January 31)
☐ Mid-year report (Non-election year only-due by July 31)
- ☐ Monthly report for the month of:
 (due by the 20th day following the month shown above, except the December report, which is due by January 31)
☐ Pre-election report (due by the 12th or 15th day before the election)
 (1) Type of election:
 (2) Date of election:
 (3) For the state of:
☐ Post-general election report (due by the 30th day after general election)
 (1) Date of election:
 (2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A).....9. \$ 7162

10 Total amount of reported expenditures (total from all attached Schedules B).....10. \$ 63332

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Brad Boeck

10/15/2016

**Sign
Here**



Signature of authorized official



Date

Form 8872 (11-2002)

Schedule A Itemized Contributions		Schedule A
Contributor's name, mailing address and ZIP code Aggregate below the threshold NA NA NA, CA 92626 -	Name of contributor's employer NA Contributor's occupation NA Aggregate contributions year-to-date \$ 14816	Amount of contribution \$ 5262 Date of contribution 09/29/2016
Contributor's name, mailing address and ZIP code Laura Gutman 310 Walls Street Durham, NC 27701 -	Name of contributor's employer Self employed Contributor's occupation Medical doctor Aggregate contributions year-to-date \$ 250	Amount of contribution \$ 250 Date of contribution 09/09/2016
Contributor's name, mailing address and ZIP code John Saliga 1930 Atchison Avenue Whiting, IN 46394 -	Name of contributor's employer Retired Contributor's occupation Retired Aggregate contributions year-to-date \$ 200	Amount of contribution \$ 200 Date of contribution 07/18/2016
Contributor's name, mailing address and ZIP code Paul Rapanault 5 Oak Hill North Bramford, CT 06471 -	Name of contributor's employer Retired Contributor's occupation Retired Aggregate contributions year-to-date \$ 300	Amount of contribution \$ 100 Date of contribution 09/09/2016
Contributor's name, mailing address and ZIP code Brian Nelson 12000 SW 14th St Roca, NE 68430 -	Name of contributor's employer Self employed Contributor's occupation Trucking Aggregate contributions year-to-date \$ 200	Amount of contribution \$ 200 Date of contribution 07/16/2016
Contributor's name, mailing address and ZIP code Will Miskall 7614 General Meade Lane Saint Louis, MO 63123 -	Name of contributor's employer Self employed Contributor's occupation Real Estate Aggregate contributions year-to-date \$ 500	Amount of contribution \$ 500 Date of contribution 09/14/2016
Contributor's name, mailing address and ZIP code William Belcher 86177 Vegas Blvd Yulee, FL 32097 -	Name of contributor's employer Gemini Motor Transport Contributor's occupation Driver Aggregate contributions year-to-date \$ 200	Amount of contribution \$ 150 Date of contribution 09/11/2016
Contributor's name, mailing address and ZIP code Robert Palatchi 954 Ridgefield Road Hamilton, OH 45013 -	Name of contributor's employer Ultimate Underground Contributor's occupation Phone cable buyer Aggregate contributions year-to-date \$ 500	Amount of contribution \$ 500 Date of contribution 09/03/2016

Form 8872 (11-2002)

Schedule B Itemized Expenditures		Schedule B
Recipient's name, mailing address and ZIP code Aggregate below threshold NA NA, CA 92626 -	Name of recipient's employer NA Recipients's occupation NA	Amount of Expenditure \$ 56 Date of expenditure 09/29/2016
Purpose of expenditure Miscellaneous fees for the quarter		
Recipient's name, mailing address and ZIP code Democracy Engine 2125 Fourteenth Street NW Washington , DC 20009 -	Name of recipient's employer NA Recipients's occupation NA	Amount of Expenditure \$ 276 Date of expenditure 09/29/2016
Purpose of expenditure Contributions processing fee for quarter		
Recipient's name, mailing address and ZIP code Committee to Restore America's Greatness 3843 S Bristol Street Suite 312 Santa Ana, CA 92704	Name of recipient's employer NA Recipients's occupation NA	Amount of Expenditure \$ 63000 Date of expenditure 07/12/2016
Purpose of expenditure To provide for programs of Stop the Steal		

Exhibit 6

Form **8872**
(November 2002)
Department of the Treasury
Internal Revenue Service

Political Organization Report of Contributions and Expenditures

OMB No. 1545-1696

▶ See separate instructions.

A For the period beginning 10/01/2016 **and ending** 10/19/2016

B Check applicable box: ☒ Initial report ☐ Change of address ☐ Amended report ☐ Final report

1 Name of organization Stop The Steal **Employer identification number** 81 - 2115618

2 Mailing address (P.O. box or number, street, and room or suite number)
3843 S Bristol Street Suite 312

City or town, state, and ZIP code
Santa Ana, CA 92704

3 E-mail address of organization: no@email **4 Date organization was formed:** 04/06/2016

5a Name of custodian of records Brad Boeck
5b Custodian's address 3843 S Bristol Street Suite 312
Santa Ana, CA 92704

6a Name of contact person Brad Boeck
6b Contact person's address 3843 S Bristol Street Suite 312
Santa Ana, CA 92704

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
3843 S Bristol Street Suite 312

City or town, state, and ZIP code
Santa Ana, CA 92704

8 Type of report (check only one box)

- ☐ First quarterly report (due by April 15)
☐ Second quarterly report (due by July 15)
☐ Third quarterly report (due by October 15)
☐ Year-end report (due by January 31)
☐ Mid-year report (Non-election year only-due by July 31)
- ☐ Monthly report for the month of:
 (due by the 20th day following the month shown above, except the December report, which is due by January 31)
☒ Pre-election report (due by the 12th or 15th day before the election)
 (1) Type of election: general
 (2) Date of election: 11/08/2016
 (3) For the state of: CA
☐ Post-general election report (due by the 30th day after general election)
 (1) Date of election:
 (2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A).....9. \$ 7365

10 Total amount of reported expenditures (total from all attached Schedules B).....10. \$ 5300

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Brad Boeck

10/26/2016

**Sign
Here**



Signature of authorized official



Date

Form 8872 (11-2002)

Schedule A Itemized Contributions

Schedule A

Contributor's name, mailing address and ZIP code

Aggregate below the threshold

NA
NA, CA 92626 -**Name of contributor's employer**

NA

Contributor's occupation

NA

Aggregate contributions year-to-date

\$ 4515

Amount of contribution

\$ 4515

Date of contribution

10/19/2016

Contributor's name, mailing address and ZIP codeHelen Lin
2513 Champions Corner
Leander, TX 78641 -**Name of contributor's employer**

Retired

Contributor's occupation

Retired

Aggregate contributions year-to-date

\$ 200

Amount of contribution

\$ 200

Date of contribution

10/15/2016

Contributor's name, mailing address and ZIP codeAnton Krell
Berth Cove 06-27
Singapore, WA 98616 -**Name of contributor's employer**

Institute of Trading

Contributor's occupation

Managing Partner

Aggregate contributions year-to-date

\$ 1000

Amount of contribution

\$ 1000

Date of contribution

10/15/2016

Contributor's name, mailing address and ZIP codeErik Foster
311 Maybrook Dr
Buda, TX 78610 -**Name of contributor's employer**

AT and T

Contributor's occupation

Technician

Aggregate contributions year-to-date

\$ 500

Amount of contribution

\$ 500

Date of contribution

10/17/2016

Contributor's name, mailing address and ZIP codeDonald Ausmus
9601 N. 10th Street Unit1
McAllen, TX 78504 -**Name of contributor's employer**

Retired

Contributor's occupation

Retired

Aggregate contributions year-to-date

\$ 200

Amount of contribution

\$ 100

Date of contribution

10/08/2016

Contributor's name, mailing address and ZIP codeJulian Webb
19 Quirk Ct
Newton, MA 02458 -**Name of contributor's employer**

M. Siedman, Inc.

Contributor's occupation

Accountant

Aggregate contributions year-to-date

\$ 500

Amount of contribution

\$ 500

Date of contribution

10/15/2016

Contributor's name, mailing address and ZIP codeGiles Wormser
Dorfstrasse 27
Fruesisberg, NJ 08835 -**Name of contributor's employer**

Swiss Investment Corp

Contributor's occupation

Executive

Aggregate contributions year-to-date

\$ 500

Amount of contribution

\$ 500

Date of contribution

10/15/2016

Contributor's name, mailing address and ZIP codeWilliam Belcher
86177 Vegas Blvd
Yulee, FL 32097 -**Name of contributor's employer**

Gemini Motor Transport

Contributor's occupation

Driver

Aggregate contributions year-to-date

\$ 250

Amount of contribution

\$ 50

Date of contribution

10/06/2016

Form 8872 (11-2002)


Schedule B Itemized Expenditures		Schedule B
Recipient's name, mailing address and ZIP code Democracy Engine 2125 Fourteenth Street NW Washington, DC 20009 -	Name of recipient's employer NA Recipients's occupation NA	Amount of Expenditure \$ 300 Date of expenditure 10/19/2016
Purpose of expenditure Contributions processing fees		
Recipient's name, mailing address and ZIP code A. Miller Research 6563 E Paseo El Greco Anaheim Hills, CA 92807 -	Name of recipient's employer NA Recipients's occupation NA	Amount of Expenditure \$ 5000 Date of expenditure 10/13/2016
Purpose of expenditure Consulting Fees		

Exhibit 7

Home - Stop The Steal



Matthew

https://stopthesteal.org





Defend the Donald BloggerAboutNewsCitizen ToolboxExit PollStatesSign In

by NEIL MUNRO



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Paid for by Stop the Steal (stopthesteal.org) and not authorized by any candidate or candidate's committee. Contributions are not deductible for federal income tax purposes as charitable contributions, and will be used in connection with federal elections. Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in a calendar year.

Contact Info

info@stopthesteal.org

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3843 South Bristol Street Suite 312
Santa Ana, CA 92704

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Exhibit 8



December 17, 2015, 03:33 pm

Trump ally launches super-PAC

By Jonathan Easley



Getty Images

Controversial political consultant Roger Stone, who left **Donald Trump's** campaign in August, has launched a super-PAC to support the GOP front-runner's bid by taking aim at his rivals — **Marco Rubio** in particular.

In an **open letter** on the website for the Committee to Restore America's Greatness, Stone alleges that the Republican establishment seeks to take down Trump.

"The Washington, D.C. insiders, special interests, lobbyists and a handful of self-interested billionaires plan an all-out paid media assault to destroy the candidacy of Donald Trump," Stone writes.

He directs the bulk of his fire at Rubio, calling him a "boy-toy for billionaires" and claiming that the Florida senator, "backed by a number of high-powered billionaires, has entered into a secret alliance with Governor John Kasich of Ohio" to defeat Trump.

"So, there you have it," Stone writes. "The RINOs (Republicans in Name Only), Rubio and Kasich, are teaming up for an expensive attack campaign in an attempt to destroy the candidacy of Donald Trump. Will you help us stop them?"

The **Wall Street Journal** first reported the news.

Stone is a colorful and enigmatic figure.

He flaunts his decadent lifestyle, and has claimed credit for contributing to the demise of former New York Attorney General Eliot Spitzer's demise, saying he provided key information to the FBI about Spitzer's prostitution scandal.

He has also worked for the campaigns of former Presidents Reagan and Nixon.

Stone and Trump appear to have a combustible relationship.

"Roger is a **stone-cold loser**," Trump told The New Yorker in 2008. "He always tries taking credit for things he never did."

But Stone worked as an adviser to Trump's campaign earlier this year, **before leaving** under odd circumstances.

Trump has so far made a point of rejecting the help of super-PACs, arguing that he's the only candidate not benefiting from the support of outside groups and claiming that because he's self-funding his campaign, he's the only one not beholden to special interests.

The super-PAC seeks a way around this.

"We are only accepting contributions from individuals," the group's website states. "Any corporate or business contributions will be returned."

A phone call to the Trump campaign has not been returned.

TAGS: Donald Trump, Marco Rubio

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Exhibit 9

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contact:

Roger Stone

stone@stonezone.com

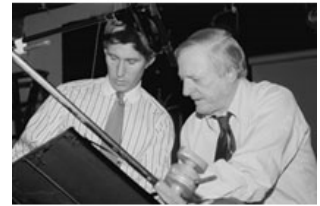
Miami Beach, FL

New York, NY

▶ TAKE A LOOK

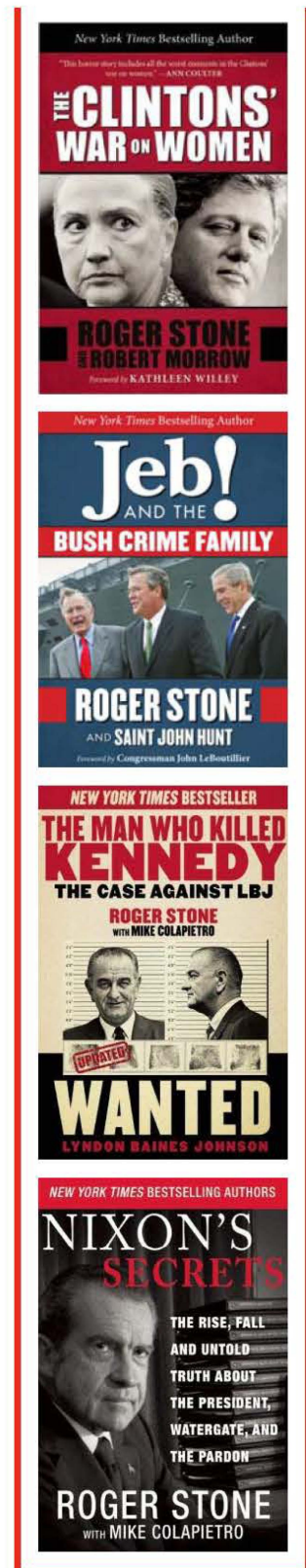
- LEAKED: Secret Brain Drug Stirs Controversy
- Big Bang Theory To End! Kaley Reveals The Shocking Reason
- 15 Cancer Causing Foods You Probably Eat Every Day
- 7x Lotto Winner: Lottery Isn't As Random As You Think
- New Denture Technology Now Available to Public
- Barb Walters Sits Down With Dr Oz: Viewers Left Speechless!
- Dwayne "The Rock" Johnson is Gone!
- No Need to Diet or Go to the Gym If You Do This Before Bed
- #1 Tinnitus Method "Ends" The Ringing
- The Diabetes Breakthrough Your Doctor Won't Tell You

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The Life and Times of Dick
Nixon

The Style of Ronald Reagan



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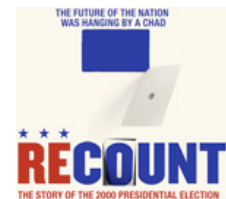
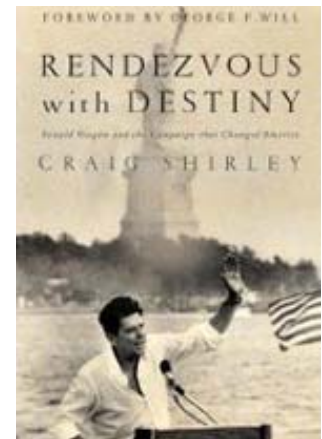


Exhibit 10

Dawn Smalls

From: Dawn Smalls
Sent: Tuesday, November 01, 2016 4:23 PM
To: 'stone@stonezone.com'
Cc: Michael J. Gottlieb (mgottlieb@bsflp.com); 'Joshua L. Kaul (Perkins Coie)'
Subject: FW: Ohio Democratic Party v. Donald J. Trump For President, Inc. (Case: 1:16-cv-02645)
Attachments: 16-2514 - As Filed Complaint.pdf; 2016.11.01 (7) -- Initial Standing Order.pdf; 2016-10-31 Dkt 7 Order.pdf; 4-1.pdf; 4-main.pdf; Complaint.pdf; Complaint.pdf; ODP v Trump Complaint.pdf; R Stone summons.pdf; Roger Stone Summons.pdf; Stop the Steal Summons.pdf; Stop the steal summons.pdf; Summons - Roger J. Stone, Jr.pdf; Summons - Stop the Steal, Inc.pdf; Activity in Case 1:16-cv-02645-JG Ohio Democratic Party v. Ohio Republican Party et al Order

Tracking:	Recipient	Delivery
	'stone@stonezone.com'	
	Michael J. Gottlieb (mgottlieb@bsflp.com)	Delivered: 11/1/2016 4:23 PM
	'Joshua L. Kaul (Perkins Coie)'	

Mr. Stone,

In my prior message, I omitted the Order issued in the Arizona action. Please find attached the complaint and summons for the actions in Ohio, Pennsylvania, Nevada, and Arizona, as well as the orders that have been issued by the assigned judge in the Arizona, Ohio and Pennsylvania matters.

Thank you.

Dawn Smalls

From: Dawn Smalls
Sent: Tuesday, November 01, 2016 4:14 PM
To: 'stone@stonezone.com'
Cc: Michael J. Gottlieb (mgottlieb@bsflp.com); 'Joshua L. Kaul (Perkins Coie)'
Subject: Ohio Democratic Party v. Donald J. Trump For President, Inc. (Case: 1:16-cv-02645)

Mr. Stone,

Please find attached the complaint and summons in the above-captioned matter, as well as for the actions in Pennsylvania, Nevada, and Arizona. I also attach for your reference orders that have been issued by the assigned judge in the Ohio and Pennsylvania matters.

Dawn Smalls

Dawn L. Smalls
Partner

BOIES, SCHILLER & FLEXNER LLP
575 Lexington Ave
New York, NY 10022

212-754-4216 (Direct)

212-446-2350 (Fax)

dsmalls@bsfllp.com

www.bsfllp.com

Exhibit 11

Dawn Smalls

From: Michael Gottlieb
Sent: Monday, October 31, 2016 5:40 PM
To: Donald F McGahn
Cc: Dawn Smalls; Kaul, Joshua L. (Perkins Coie) (JKaul@perkinscoie.com)
Subject: RE: Ohio Democratic Party v. Donald J. Trump For President, Inc. (Case: 1:16-cv-02645)
Attachments: D Trump for Pres summons.pdf; 16-2514 - As Filed Complaint.pdf

Mr. McGahn,

I attach the complaint and summons in the Nevada action.

Respectfully,

MICHAEL J. GOTTLIEB
BOIES, SCHILLER & FLEXNER LLP
5301 WISCONSIN AVENUE NW
WASHINGTON, DC 20015
(202) 237-9617 (OFFICE)
(202) 744-0858 (MOBILE)
MGOTTLIEB@BSFLLP.COM

From: Donald F McGahn [<mailto:dmcgahn@jonesday.com>]
Sent: Monday, October 31, 2016 3:17 PM
To: Michael Gottlieb
Cc: Dawn Smalls; Kaul, Joshua L. (Perkins Coie) (JKaul@perkinscoie.com)
Subject: Re: Ohio Democratic Party v. Donald J. Trump For President, Inc. (Case: 1:16-cv-02645)

Mr. Gottlieb:

I will accept service of process in these cases on behalf of Donald J. Trump for President, Inc. on one condition. We will need to retain local counsel to defend them and until someone has entered appearances in these cases on the campaign's behalf, I ask that you or one of your associates please notify me of any court deadlines or other dates.

I hope to have counsel retained soon after service, but it may take a day or two.

Thank you,

Donald F. McGahn II
JONES DAY® - One Firm WorldwideSM
51 Louisiana Ave., NW
Washington, DC, 20001
Office +1.202.879.3748
dmcgahn@jonesday.com

From: Michael Gottlieb <MGottlieb@BSFLLP.com>
To: "dmcgahn@jonesday.com" <dmcgahn@jonesday.com>
Cc: "Kaul, Joshua L. (Perkins Coie) (JKaul@perkinscoie.com)" <JKaul@perkinscoie.com>, Dawn Smalls <DSmalls@BSFLLP.com>

Date: 10/31/2016 02:05 PM
Subject: Ohio Democratic Party v. Donald J. Trump For President, Inc. (Case: 1:16-cv-02645)

Dear Mr. McGahn,

As you may know, our law firms represent the Ohio Democratic Party in litigation brought against several defendants, including Donald J. Trump for President, Inc., in the Northern District of Ohio. We also represent the parties involved in litigation by other state parties against defendants including the Trump for President, Inc., in other jurisdictions. Would you kindly advise at your earliest convenience whether you will accept service on behalf of the Trump for President, Inc.?

Respectfully,

Michael J. Gottlieb
Boies, Schiller & Flexner LLP
5301 Wisconsin Avenue NW
Washington, DC 20015
(202) 237-9617 (office)
(202) 744-0858 (mobile)
mgottlieb@bsfllp.com

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Exhibit 12

Victor Zapana

From: Michael Gottlieb
Sent: Tuesday, November 01, 2016 4:12 PM
To: dmcgahn@jonesday.com
Cc: Don McTigue (dmctigue@electionlawgroup.com); Kaul, Joshua L. (Perkins Coie) (JKaul@perkinscoie.com); Dawn Smalls; Chad Cooper; Zach West (zwest@ohiodems.org)
Subject: RE: Activity in Case 1:16-cv-02645-JG Ohio Democratic Party v. Ohio Republican Party et al Order

Mr. McGahn,

Please also advise at your earliest convenience if you know whether Mr. Stone and/or his organization, Stop the Steal, are represented by counsel in this matter (or the matters filed in NV, AZ, or PA), and if so, how we may contact said counsel.

Thank you,

MICHAEL J. GOTTLIEB
BOIES, SCHILLER & FLEXNER LLP
5301 WISCONSIN AVENUE NW
WASHINGTON, DC 20015
(202) 237-9617 (OFFICE)
(202) 744-0858 (MOBILE)
MGOTTLIEB@BSFLLP.COM

From: Michael Gottlieb
Sent: Tuesday, November 01, 2016 3:56 PM
To: dmcgahn@jonesday.com
Cc: Don McTigue (dmctigue@electionlawgroup.com); Kaul, Joshua L. (Perkins Coie) (JKaul@perkinscoie.com); Dawn Smalls
Subject: FW: Activity in Case 1:16-cv-02645-JG Ohio Democratic Party v. Ohio Republican Party et al Order

Mr. McGahn,

Please see the just released order in the Ohio matter.

Respectfully,

MICHAEL J. GOTTLIEB
BOIES, SCHILLER & FLEXNER LLP
5301 WISCONSIN AVENUE NW
WASHINGTON, DC 20015
(202) 237-9617 (OFFICE)
(202) 744-0858 (MOBILE)
MGOTTLIEB@BSFLLP.COM

From: <ohndecf@ohnd.uscourts.gov>
Date: November 1, 2016 at 3:30:24 PM EDT

To: <OHNDdb_NEF@ohnd.uscourts.gov>

Subject: Activity in Case 1:16-cv-02645-JG Ohio Democratic Party v. Ohio Republican Party et al Order

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U.S. District Court

Northern District of Ohio

Notice of Electronic Filing

The following transaction was entered on 11/1/2016 at 3:30 PM EDT and filed on 11/1/2016

Case Name: Ohio Democratic Party v. Ohio Republican Party et al

Case Number: [1:16-cv-02645-JG](#)

Filer:

Document Number: No document attached

Docket Text:

Order [non-document] entered by Judge James S. Gwin on 11/1/16. IMPORTANT: Defendants shall file a response to plaintiff's complaint by close of business tomorrow, 11/2/16, and shall respond as to whether they have any objection to the entrance of an order limiting voter intimidation or an order limiting people at polling locations who are not authorized poll watchers or outside the polling stations. (Related Doc. [1]) (D,MA)

1:16-cv-02645-JG Notice has been electronically mailed to:

Steven S. Kaufman steve.kaufman@kaufman-company.com, candise.gusman@kaufman-company.com

Donald J. McTigue dmctigue@electionlawgroup.com, mamcginnis@rrohio.com

Charles D. Cooper, II chad.cooper@kaufman-company.com, candise.gusman@kaufman-company.com

Derek S. Clinger dclinger@electionlawgroup.com

1:16-cv-02645-JG Notice has been delivered by other means to:

Exhibit 13

Victor Zapana

From: Michael Gottlieb
Sent: Tuesday, November 01, 2016 10:30 PM
To: dmcgahn@jonesday.com
Cc: Spiva, Bruce V. (Perkins Coie) (BSpiva@perkinscoie.com); Kaul, Joshua L. (Perkins Coie) (JKaul@perkinscoie.com); Dawn Smalls
Subject: RE: Activity in Case 2:16-cv-02514-RFB-NJK Nevada State Democratic Party v. Nevada Republican Party et al Minute Order Setting Hearing on Motion

Mr. McGahn,

Please confirm that you have received this email, as well as my email from earlier today informing you about the hearing scheduled for Thursday in Arizona.

I also would re-up my question from earlier today: if you know who, if anyone, may be representing Mr. Stone and/or his organization in these matters, we would greatly appreciate you letting us know.

Best –

MICHAEL J. GOTTLIEB
BOIES, SCHILLER & FLEXNER LLP
5301 WISCONSIN AVENUE NW
WASHINGTON, DC 20015
(202) 237-9617 (OFFICE)
(202) 744-0858 (MOBILE)
MGOTTLIEB@BSFLLP.COM

From: Michael Gottlieb
Sent: Tuesday, November 01, 2016 7:23 PM
To: dmcgahn@jonesday.com
Cc: Spiva, Bruce V. (Perkins Coie) (BSpiva@perkinscoie.com); Kaul, Joshua L. (Perkins Coie) (JKaul@perkinscoie.com); Dawn Smalls
Subject: FW: Activity in Case 2:16-cv-02514-RFB-NJK Nevada State Democratic Party v. Nevada Republican Party et al Minute Order Setting Hearing on Motion

Mr. McGahn,

A hearing has been scheduled in the Nevada matter for 3:30pm tomorrow.

Respectfully,

Mike

MICHAEL J. GOTTLIEB
BOIES, SCHILLER & FLEXNER LLP
5301 WISCONSIN AVENUE NW
WASHINGTON, DC 20015
(202) 237-9617 (OFFICE)
(202) 744-0858 (MOBILE)
MGOTTLIEB@BSFLLP.COM

From: cmecf@nvd.uscourts.gov [mailto:cmecf@nvd.uscourts.gov]

Sent: Tuesday, November 01, 2016 7:14 PM

To: cmecfhelpdesk@nvd.uscourts.gov

Subject: Activity in Case 2:16-cv-02514-RFB-NJK Nevada State Democratic Party v. Nevada Republican Party et al
Minute Order Setting Hearing on Motion

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United States District Court

District of Nevada

Notice of Electronic Filing

The following transaction was entered on 11/1/2016 at 4:14 PM PDT and filed on 11/1/2016

Case Name: Nevada State Democratic Party v. Nevada Republican Party et al

Case Number: [2:16-cv-02514-RFB-NJK](#)

Filer:

Document Number: 15(No document attached)

Docket Text:

MINUTE ORDER IN CHAMBERS of the Honorable Richard F. Boulware, II, on 11/1/2016.

IT IS ORDERED that a Hearing regarding the [6] Emergency MOTION for Temporary Restraining Order is set for November 2, 2016 at 3:30 PM in LV Courtroom 7C before Judge Richard F. Boulware, II.

(no image attached) (Copies have been distributed pursuant to the NEF - BEL)

2:16-cv-02514-RFB-NJK Notice has been electronically mailed to:

Don Springmeyer dspringmeyer@wrslawyers.com, cmixson@wrslawyers.com, crehfeld@wrslawyers.com,
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Bradley Scott Schrager bschrager@wrslawyers.com, ODavidoff@wrslawyers.com,
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2:16-cv-02514-RFB-NJK Notice has been delivered by other means to:

Marc E. Elias
Perkins Coie LLP

700 13th Street, N.W.
Washington, DC 20005

Exhibit 14

Democrats Sue Donald Trump, Roger Stone for Voter Intimidation in 4 States

 lawnewz.com/high-profile/breaking-democrats-sue-donald-trump-roger-stone-for-voter-intimidation-in-4-states/

By Rachel Stockman

Leaders from state Democratic parties in four states have filed federal lawsuits against **Donald Trump**, Trump advisor **Roger Stone**, and state Republican parties for “conspiring to threaten, intimidate, and thereby prevent minority voters in urban neighborhoods from voting in the 2016 election.” The legal effort is lead by **Marc Elias**, the general counsel for the **Hillary Clinton** campaign.

The lawsuits filed in [Nevada](#), [Arizona](#), [Pennsylvania](#), and [Ohio](#) are asking a judge to stop the defendants from monitoring polls, verbally harassing voters, and following them around to take pictures.



In one of the lawsuits, [filed by the Nevada Democratic Party](#), against Stone, Trump, and the Nevada Republican Party, the plaintiffs point to a statement given by an unnamed Trump official that “[w]e have three major voter suppression operations under way” as evidence. The complaint further alleges:

Trump’s supporters have responded with pledges to descend upon polling places in “certain areas” where many minority voters live in order to interfere with their efforts to exercise the franchise...

Immediate relief is necessary. There are only 8 days left until Election Day, and early in-person voting in Nevada is well underway. Trump’s calls for unlawful intimidation have grown louder and louder, and the conspiracy to harass and threaten voters on Election Day has already resulted in numerous acts that threaten to interfere with the voting rights of registered Nevada voters.

The complaint also names Stop the Steal, which is a super PAC formed by Trump advisor **Roger Stone**. In the lawsuits, the Democrats claim “Stone has a history of engaging in voter intimidation, racist and misogynist hate speech, and incitement to violence.”

The lawsuit then goes through several instances in which Trump allegedly spread “misinformation” about the election being rigged. For example, at an October 20 rally in Delaware, Ohio, Trump told the crowd that Clinton is “truly capable of anything, including voter fraud.” The lawsuit alleges that Trump, Stone, and the local Republican parties have violated the Voting Rights Act, and the Klu Klux Klan Act. We are reaching out to the defendants for comment, and will update accordingly.

[Last Wednesday](#), the DNC [filed a motion in federal court](#) which claimed that the RNC, through **Donald Trump**’s own statements, violated a longstanding consent decree that prohibits Republicans from engaging in “ballot security” measures which could intimidate minorities.

Update 2:20 pm October 31, 2016:

Statement from Roger Stone:

"I'm honored but the lawsuit is without merit and the lawyers who filed it could face sanctions. Stop the Steal in partnership with Vote Protectors is conducting a neutral, scientifically based EXIT POLL in order to compare the actual machine results with the exit poll results in 7000 key precincts. Precincts are chosen base on one party rule and past reports of irregularities- not racial make-up as falsely reported in the alt-left media. The US State Department (under Hillary Clinton) required not more than a 2 % deviance between actual reported results and exit poll results in judging the integrity of foreign elections. All we ask is the same standard apply to the 2016 Presidential election. Since it is our intention to interview voters voluntary after they vote it had to see how voters would find this intimidating. Our methodology is no different than that used in the network consortium exit polls. We are not coordinating with the Trump campaign , the Republican National Committee or the individual Republican State Committees. We seek only to determine if the election is honestly and fairly conducted and to provide a an evidentiary basis for a challenge to the election if that is not the case. I assume the purpose of this bogus lawsuit is to distract from the voter-fraud the Democrats have traditionally engaged in.

Racist? I was working and marching for reform of New York's racist Rockefeller Drug laws before the DNC spokesperson was born."

Exhibit 15



Roger Stone

@RogerJStoneJr



I'm honored and flattered but the Democrats lawsuit against me is utter bullshit.
StoptheSteal.com Exit Poll will not be stopped.

RETWEETS

376

LIKES

651



10:04 PM - 31 Oct 2016



376



651

